UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF INDIANA INDIANAPOLIS DIVISION

| IN RE: |) |
|-------------------|-----------------------------|
| MARK A FRANKLIN |) CASE NUMBER: 14-00478-JJG |
| VIRGINIA FRANKLIN |) |
| DEBTOR |) CHAPTER 13 |

MOTION TO CONTINUE HEARING

Comes now Debtors' counsel, Steven P. Taylor (18913-49), and in support of said Motion would state as follows:

- 1. That Debtors filed their Petition for Bankruptcy under Chapter 13 on January 24, 2014.
- 2. That a hearing is currently scheduled on October 3, 2017 @ 2:30 p.m., in room 311, U.S. Courthouse, 46 East Ohio Street, Indianapolis, IN 46204 with respect to the Trustee's Motion to Dismiss and Debtors Objection thereto.
- 3. That Debtors' counsel will be out of state from September 28, 2017 through October 3, 2017 and will be unable to attend this scheduled hearing.
- 4. That counsel has contacted the Chapter 13 Trustee and she consents to a continuance of this hearing.

WHEREFORE, Debtors' counsel, hereby request that the Court reset the hearing to a date that is convenient on the court's calendar and for all other relief just and proper in the premises.

Respectfully submitted,

/s/ Steven P. Taylor Steven P. Taylor (18913-49) 6100 N. Keystone Ave., #254 Indianapolis, IN 46220

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Email: sptaylor@bankruptcyoffice.net

CERTIFICATE OF SERVICE

The Undersigned hereby certifies that the item attached hereto was served electronically or mailed to those persons listed below at the addresses shown therein by depositing the same by U.S. Mail on the date this Motion to Continue was filed, properly addressed with postage prepaid.

Chapter 13 Trustee (ECF MAIL) Ann Delaney

U.S. Trustee (ECF MAIL) ustpregion10.in.ecf@usdoj.gov

/s/ Steven P. Taylor

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